

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:  
  
ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

**JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING EXHIBITS TO  
JOINT LETTER BRIEF REGARDING  
WHETHER CERTAIN META  
DOCUMENTS ARE PROTECTED BY  
ATTORNEY-CLIENT PRIVILEGE (ECF  
2474)**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and through their undersigned counsel, the MDL Personal Injury and School District (“PI/SD”) Plaintiffs, the JCCP Personal Injury Plaintiffs (“JCCP Plaintiffs”), and the MDL State Attorneys General (“State AGs”) (collectively, “Plaintiffs”); and the Meta Defendants (“Meta”) hereby stipulate and agree that the Court may properly consider Exhibits A-F, M-O, and H-L attached to the Parties’ Joint Letter Brief Regarding Whether Certain Meta Documents Are Protected by Attorney-Client Privilege (“November 20 Letter-Brief”) (ECF No. 2474), regardless of whether those exhibits were previously stipulated-to (*see* ECF 2448). The Parties thus withdraw their objections to the Court considering the other side’s Exhibits as stated in the November 20 Letter-Brief.

**IT IS SO STIPULATED**, through Counsel of Record.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Peter H. Kang  
United States Magistrate Judge

Respectfully submitted,

DATED: November 24, 2025

By: /s/ Lexi J. Hazam

LEXI J. HAZAM

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 24, 2025

By: /s/ Ashley M. Simonsen